

ATTACHMENT 1

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:)
Unitel Global, LLC)
Application Under Section)
214 of the Communications Act of 1934,)
As Amended, for Global Authority For the Provision) File No. _____
Of Resold and Facilities-Based International)
Switched Services Between the U.S. and Various)
International Points)

Unitel Global, LLC attests to its qualification for streamlined processing under 63.12 as follows:

Unitel Global, LLC ("Applicant") is not a foreign carrier; however the Applicant holds a 50% ownership interest in Eterlab S.A., which is a foreign carrier authorized to provide local and international service to customers in Argentina. Applicant nevertheless qualifies for streamlined processing pursuant to Section 62.12(c)(1)(ii), based on the following:

The Applicant qualifies for a presumption of non-dominance under Section 63.10(a)(3). Applicant's foreign affiliate, Eterlab S.A., is not a monopoly provider of telecommunications services in Argentina and lacks sufficient market power in Argentina to adversely affect competition in the U.S. market. Eterlab S.A. was organized in 1999, and began operating in Argentina in 2000. Eterlab S.A. is not an incumbent facilities-based provider of either local or international long distance telecommunications services in Argentina. The two incumbent providers of national telecommunications and international services in Argentina are Telecom Argentina S.A. and Telefonica de Argentina S.A.

Eterlab S.A. provides switched local access and international services to customers in Argentina by reselling the underlying switched access and transport facilities of other unaffiliated carriers, including those of Telecom Argentina and Telefonica de Argentina. Eterlab S.A. owns some point-to-point fiber optic facilities within Argentina; however, these facilities are not utilized to provide international switched transport or access services, and thus do not adversely affect competition for international transport or local access for calls that originate or terminate in Argentina.

Eterlab S.A.'s 2004 annual revenues were approximately \$400,000. In contrast, Telecom Argentina S.A. reported 2004 net sales of approximately \$1.5 billion (US), while Telefonica de Argentina reported 2004 revenue of approximately \$1 billion (US). These figures demonstrate that Eterlab S.A. controls well below 50% of the international transport and local access markets in Argentina and has no ability to control or impede market entry or competition.

Unitel Global, LLC responds to Question 12 (Section 63.18(j)) of the Application as follows:

Unitel Global, LLC seeks to provide international telecommunications services to Argentina and Applicant owns 50% of a foreign carrier in that country, Eterlab S.A.

Unitel Global, LLC responds to 63.18 (d), (e), (g), (i), (k), (l) and (m) as follows:

- (d)** Unitel Global, LLC has not received previous authority under Section 214.
- (e)** Unitel Global, LLC requests Section 214 Authority to operate as a resale carrier pursuant to the terms and conditions of Section 63.18(e)(2).
- (g)** Unitel Global, LLC seeks facilities-based authority pursuant to the terms and conditions of Section 63.18(e)(1). Unitel Global, LLC does not seek facilities-based authority as defined by Section 1.1306, therefore no environmental assessment as described in Section 1.1311 is applicable.
- (i)** Unitel Global, LLC is affiliated with a foreign carrier, Eterlab S.A., which is authorized to provide telecommunications service in Argentina.
- (k)(1)** Argentina is a member of the World Trade Organization.
- (l)**
and
- (m)** As described previously, Unitel Global, LLC satisfies the requirements of Section 63.10(a)(3) for a presumption of non-dominance and therefore qualifies for regulation as a non-dominance carrier for the provision of international telecommunication service to Argentina.

Unitel Global, LLC will comply with the terms and conditions contained in Section 63.21, 63.22 and 63.23 of the Commission's Rules. 47 C.F.R. 63.21-63.23.